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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 3, 1994

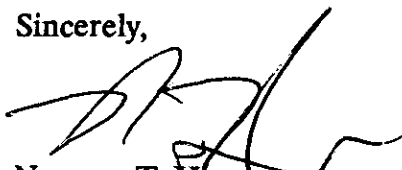
Ms. Pam Innis
U.S. Environmental Protection Agency
712 Swift Blvd, Suite 5
Richland, WA 99352

Dear Pam:

The attached Washington State Department of Ecology comments on the *Proposed Plan for the Environmental Restoration Disposal Facility at Hanford, Richland, Washington*, DOE/RL-94-47, dated April 1994, are being provided to you for your consideration and inclusion in EPA's formal response to the U. S. Department of Energy. 37513

If you have any questions or would like to discuss the comments further, please call me at 736-3048. Thank you.

Sincerely,


Norman T. Hepner
Nuclear Waste Program

NH:mf
Enclosure



HANFORD PROJECT OFFICE

MAY 6 1994

ENVIRONMENTAL PROTECTION
AGENCY

**COMMENTS ON THE PROPOSED PLAN FOR THE ENVIRONMENTAL
RESTORATION DISPOSAL FACILITY AT HANFORD, RICHLAND, WASHINGTON
DOE/RL-94-47, APRIL 1994**

GENERAL COMMENTS:

1. The Proposed Plan's current format and content is tiring. The plan should be structured to provide the public an exciting forum to discuss ERDF. Graphics, bullets, captions, tables, etc., should be used in lieu of the traditional document approach. The plan's content should consider the audience and their concerns. The Proposed Plan is written for the public and should be structured for ease of reading and understanding. Recommendations for modification of the Proposed Plan's current format include:
 - The Site Background section should include separate captioned discussions on site selection, waste volumes, hydrogeology, and mature shrub-steppe habitat.
 - The Remedial Action Objectives (RAO) section needs to generally discuss the need and purpose of RAOs in a language easily understood and meaningful to the public. It is appropriate to shorten the discussion following each specific RAO.
 - In the Waste Acceptance Criteria section, the discussion on waste volumes and characteristics should be moved to the Site Background section. The last paragraph on waste acceptance criteria should be moved to a section on explanation of risks following the Site Background. This Explanation of Risks section should provide a discussion of the deep area-fill trench and the benefits it provides.
 - In the Summary of Alternatives section, use a table for listing the alternatives. In this section, the preferred alternative should be mentioned and justified. Each component of the alternatives should be explained, i.e., no liner, single liner, double liner, Hanford barrier, soil barrier, modified RCRA barrier, and no action.
 - In the Evaluation Criteria section, the text should be bulleted for ease of comprehension.
 - In the Evaluation of Alternatives, a single table showing all the alternatives and their evaluation against the criteria would assist the reader in their analysis. An easy ranking system might be more appropriate for some

criteria (using a + + / + / - / - / 0 system for all criteria with the exception of cost) or a numerical ranking system from 1 to 10 for all except cost. The tables currently provided are too specific for public analysis.

- The Comparative Analysis section is not necessary. The conclusion in this section could be appropriately placed in Summary of the Proposed Alternative section.
- The Summary of the Proposed Alternative section needs to be changed to reflect the preferred alternative discussed in General Comment #3.
- Many of the figures in the proposed plan are not effective. The plan should include a location graphic on page 1 similar to Figure 1. A figure of the general layout of the deep area-fill trench to include the liner and barriers would be effective in conveying information. Other graphics should be used to convey information. Graphics should be placed within the text and not isolated to the end of the document.

2. Currently, the preferred alternative is not stated until page 11. A discussion near the beginning, following site background and risks, would be appropriate to inform the audience early of the preferred alternative. The audience can then determine if they desire to read the Proposed Plan completely.
3. The preferred alternative is incorrectly identified. The preferred alternative is a double-lined facility with a RCRA compliant cover. If information during operations indicates that a lower cost alternative is equally protective, then a modification to the RCRA CAMU permit will be required.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

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Nuclear Waste Program

Admin. Record, WHC

Incoming: 94063044

Subject: PROPOSED PLAN FOR THE ENVIRONMENTAL RESTORATION DISPOSAL FACILITY AT
HANFORD, RICHLAND, WASHINGTON

INTERNAL DISTRIBUTION

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